

To: Odendahl, Steve[Odendahl.Steve@epa.gov]; Denawa, Mai[Denawa.Mai@epa.gov]
From: Russ, Timothy
Sent: Tue 11/1/2016 2:42:05 PM
Subject: (FYI) Email to FHWA- Conclusion of the PM10 conformity consultation: FHWA/EPA-R9 South Mountain Freeway project + Additional Questions

Hi Steve and Mai,

With regard to our late day conversation yesterday on the I-70 East project, attached below is an email that I sent on 10/27/16 to Jeff Houk (FHWA Resource Center), early that morning, that requested additional information on the changes to the modeling for the I-70 East project:

Previously, my email to the entire EPA group contained the following item at the bottom:

Ex. 5 - Deliberative Process

Please let me know if there are any questions.

Thanks!

Tim

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From: Russ, Timothy
Sent: Thursday, October 27, 2016 9:33 AM
To: Houk, Jeff (FHWA) <Jeff.Houk@dot.gov>
Cc: Dresser, Chris <Dresser.Chris@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>
Subject: Conclusion of the PM10 conformity consultation: FHWA/EPA-R9 South Mountain Freeway project + Additional Questions

Hi Jeff,

Thanks for forwarding the below email from Region 9. We had a couple of other questions regarding the information that FHWA presented at Tuesday's (10/25/16) Cooperating Agencies meeting and would appreciate additional information that we will want to share within Region 8 and OTAQ.

1.) The attached email from Region 9, regarding the PM₁₀ conformity consultation for the South Mountain Freeway project near Phoenix, AZ, addressed comments and FHWA responses on the Draft EIS for the project. Did Region 9 provide additional comments and/or conformity consultation on the Final EIS?

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3.) We were aware before of a Sierra Club comment on the numbers and percentage of trucks on the I-70 East project. They had presented CDOT data that showed higher percentages of trucks than appeared to be used in the I-70 East FEIS. This issue, and using Sierra Club's comments, was also raised by two Denver City Councilmembers, in a letter to EPA dated 4/26/16, as follows:

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on I-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

We responded to this question in our letter of 6/22/16, which CDOT and FHWA received a copy, and noted:

"B.) Question #3 regarding truck emissions:

The EPA's transportation conformity regulation requires that estimated pollutant concentrations must be based on the total emission burden which may result from the project and future background concentrations (40 CFR 93.123©(1)). The EPA's guidance for modeling emissions from highways is that local traffic data should be used to characterize each link sufficiently. As we noted above, an updated hot-spot analysis is being developed for 2040 by CDOT/FHWA, and the EPA will be reviewing the percentage of trucks used for the analysis."

Ex. 5 - Deliberative Process

Thanks!

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From: Houk, Jeff (FHWA) [<mailto:Jeff.Houk@dot.gov>]
Sent: Tuesday, October 25, 2016 2:39 PM
To: Russ, Timothy <Russ.Tim@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>
Subject: FW: Conclusion of the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project

Referred to FHWA

From: meek, clifton [<mailto:meek.clifton@epa.gov>]
Sent: Thursday, August 21, 2014 5:50 PM
To: Yedlin, Rebecca (FHWA)
Cc: Hansen, Alan (FHWA); Houk, Jeff (FHWA); Dunning, Connell
Subject: Conclusion of the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project

Hi Rebecca-

I spoke with Alan Hansen this morning regarding the additional air quality comments EPA had sent on both 8/19 and 8/6, and he confirmed that all of the comments are being addressed by FHWA, and the Air Quality Technical Report revised accordingly. With that information, this

concludes the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project. We'd like to thank FHWA for working so closely with EPA to address our concerns, and we look forward to reviewing and providing comments on the Final EIS when it is circulated for review.

Please see the attached spreadsheet for a summary of the consultation (comments and responses) that has taken place between EPA and FHWA since we received the Air Quality Technical Report on 6/2/2014. If you have any questions or notice any revisions that should be made to the summary, please let me know.

Thanks,

Clifton

Clifton Meek, Life Scientist

U.S. EPA, Region 9

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